

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

CHASOM BROWN, et al., individually and
on behalf of all similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

DECLARATION OF BORBALA BENKO

I, Borbála Katalin Benkő, declare as follows:

1. I am a Senior Staff Software Engineer at Google. I make this declaration based on personal knowledge and information confirmed to me by Google colleagues and, if called to testify, I could and would competently testify to such facts.

2. Google's anti-fraud measures are used to find and deter malicious traffic by actors that seek to harm Google and its users. These anti-fraud measures are scrutinized by such actors to reveal ways in which they may mount attacks on Google's systems and its users. Information relied upon by Google for anti-fraud work that is made public, such as information or methods it does (or does not) rely upon to detect fraudulent activity, may be used for malicious purposes and places Google at increased risk for fraud and cyber attacks. Google maintains this information, including as to specific heuristics used, as confidential and highly sensitive in the ordinary course of business.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed on the 21st day of December 2022 at Zurich, Switzerland.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

By: DocuSigned by:



Borbála Katalin Benkő